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May 17, 2004

The Honorable Bruce Duke
Executive Director
Public Service Commission of SC
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region
InterLATA Services Pursuant to Section 271 of the Telecommunications Act of
1996
Docket No. 2001-209-C

Dear Mr. Duke:

Enclosed for filing are the original and 15 copies of BellSouth Telecommunications, Inc.'s ("BellSouth's") performance data change Notification Reports for June 2004 and preliminary July 2004. These data change Notification Reports are being provided to inform the Commission of the changes BellSouth plans to make to its Performance Measures Analysis Platform ("PMAP") with June data, and previews the changes BellSouth is considering making for July data. A Data Disclosure Report for May 2004 would be filed at this time as well, if needed; however, for May 2004 there are no additional South Carolina validated data issues to be disclosed that affect performance measurement calculations for which a fix has not yet been scheduled.

There are two additional matters that BellSouth would like to bring to the attention of the Commission and the parties. First, in its February 2004 Data Notification filed on January 7, 2004, BellSouth provided notice of a problem classifying ADSL products identified by certain FIDs (Item No. 5). Although BellSouth expected to implement this change with February data, the change will be implemented with April 2004 data instead.

Second, in its March 2004 Data Notification filed on April 28, 2004, BellSouth provided notice of mechanizing the Service Order Accuracy report. This change, which was Item No. 6 on the Proposed March 2004 Data Notification, was not implemented

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completely. BellSouth will make additional changes with April 2004 data to address this problem.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick W. Turner". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Patrick W. Turner

PWT/nml

Enclosure

cc: All Parties of Record

PC Docs # 537981

PROPOSED JUNE 2004 DATA NOTIFICATION

BellSouth proposes making the changes described in this document to generate results for the June 2004 data month. Results for the June 2004 data month will be posted as follows:

Preliminary results July 21, 2004
Final results July 30, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

(1) *Affected Measures:* O-7 & O-8

Description of Change: Currently, BellSouth is calculating the Reject Interval for non-mechanized Trunk ASRs from the initial received date, without considering subsequent versions. BellSouth proposes to correctly identify and align the appropriate response timestamp with the corresponding version of the ASR. This modification will also allow for the proper reporting of these measures by assuring that the Reject occurred in the correct reporting period. This proposed change was Item (1) on the Preliminary June Data Notification filed on April 1, 2004. (RQ4862)

Impact of Change: For March 2004, 624 ASRs would be affected by this proposed change, 373 of which were true clarifications.

(2) *Affected Measures:* O-11 (Alabama, Kentucky, Mississippi, and South Carolina)

Description of Change: Currently, in the states where multiple responses under this measure are reported, Local Interconnection Trunks are not included as a product on the Aggregate and 12 month reports. Additionally, they are not included on the multiple response regional reports for this measure. BellSouth proposes to correct both these reporting problems. This proposed change was Item (2) on the Preliminary June Data Notification filed on April 1, 2004. (RQ5123)

Impact of Change: None.

(3) *Affected Measures: O-7*

Description of Change: Currently, a CLEC can respond to a fatal reject with the same CC, PON and Version. For LSRs that have LNP requests, BellSouth is not always able to associate this LSR with the appropriate receipt time. BellSouth proposes to add an additional key to correctly identify the receipt time of this LSR. This proposed change was Item (3) on the Preliminary June Data Notification filed on April 1, 2004. (RQ5124)

Impact of Change: For January 2004, 49 of 2451 (2%) LNP fatal reject records in the region were not counted as a result of this issue.

(4) *Affected Measures: O-9 & O-11*

Description of Change: Currently, BellSouth is not correctly associating the confirmed timestamps with ASRs submitted for Local Interconnection Trunks. BellSouth proposes to correct the code to capture responses for Local Interconnection Trunks. This proposed change was Item (4) on the Preliminary June Data Notification filed on April 1, 2004. (RQ5134)

Impact of Change: For January 2004, the result for Local Interconnection Trunks under Measure O-11 would change from 84.78% to 100% in Tennessee.

(5) *Affected Measures: O-7, O-8, O-9 & O-11*

Description of Change: Effective April 26, 2004, per Carrier Notification Letter SN91084039, the following LSRs transitioned from the Atlanta LCSC to the Birmingham LCSC:

- Unbundled Network Elements (UNE) including Local Number Portability (LNP) with the exception of Unbundled Network Element – Platform (UNE-P); and
- Complex Services-Resale & UNE Switched

Currently, the processing time for partially mechanized and non-mechanized LSRs is recorded based on central time because BellSouth did not know whether the LSR would be processed in either the Birmingham or Atlanta LCSC. With this change, BellSouth will know that the above-mentioned LSRs will be processed in the Birmingham LCSC, so that the correct interval can be calculated. BellSouth proposes to change the PMAP code to reflect this process change. (RQ5193)

Impact of Change: For March 2004, in Florida, on the Partially Mechanized FOC Timeliness report, 40 of 1,317 LSRs would have been reported as meeting the benchmark of 10 hours.

Provisioning Measurements

- (6) *Affected Measures:* P-4 (Louisiana only)

Description of Change: Currently, the MSA Aggregate One Month reports for OCI display an incorrect Average Interval for both BST and CLECs. BellSouth proposes to correct the average interval to display the correct average per product. This proposed change was Item (5) on the Preliminary June Data Notification filed on April 1, 2004. (RQ5024)

Impact of Change: For December 2003 data, the average interval for Alexandria, LA, MSA-Resale Business Non-Dispatch, the metric would change from 0.0 to 2.0 and for Retail Business, the metric would change from 0.0 to 1.73 days.

- (7) *Affected Measures:* P-7C

Description of Change: Currently, BellSouth is not displaying all disaggregations on the 12-month report when there is no data to place on the historical report. BellSouth proposes to display all disaggregations on the 12-month report even when no data is present in the reporting period. This proposed change was Item (6) on the Preliminary June Data Notification filed on April 1, 2004. (RQ5029)

Impact of Change: None.

- (8) *Affected Measures:* P-7, P-7A, P-7C & P-8

Description of Change: BellSouth proposes adding new fields to the raw data and Other Supporting Data File (CTOVR_CMPLTN_DTTM, CTOVR_KEY, SO_CMPLTN_DT). The addition of these fields will have no immediate impact on replicating the SQM reports but would be available for use with future enhancements. This proposed change was Item (7) on the Preliminary June Data Notification filed on April 1, 2004. (RQ5044)

Impact of Change: None.

- (9) *Affected Measures:* P-2B

Description of Change: Currently, for % Orders Given Jeopardy Notice, the numerator includes orders where the committed date of facility resolution is within the reporting period. BellSouth proposes to implement coding to capture orders with a due date in the reporting period instead of the committed date of the facility resolution in the reporting period consistent with the SQM. This proposed change was Item (8) on the Preliminary June Data Notification filed on April 1, 2004. (RQ5107)

Impact of Change: For December 2003, in Florida, for % Jeopardy – Mechanized, UNE Loop + Port Combinations, Dispatched, the numerator would change from 233 to 176. This would cause the result to change from 6.95% to 5.25%.

(10) *Affected Measures:* P-2A (Florida and Tennessee only)

Description of Change: Currently, for % Orders Given Jeopardy Notice \geq 48 Hours, BellSouth is using the committed due date of the facility resolution to determine which orders to include in the denominator of this measure. BellSouth proposes to capture orders with the committed due date in the reporting period in Florida and Tennessee for both the numerator and denominator consistent with the SQM. This proposed change was Item (9) on the Preliminary June Data Notification filed on April 1, 2004. (RQ5107)

Impact of Change: For December 2003 in Florida, the Percent Jeopardy Notice >48 Hours Mechanized, the UNE Loop + Port Combination Dispatch disaggregation, the denominator would change from 233 to 176. This would cause the result to go from 75.5% to 100%.

(11) *Affected Measures:* P-11 (Florida, Georgia, and Tennessee only)

Description of Change: BellSouth is currently including “C” orders written in response to LSRs with an ACT of ‘C’ and an LNA of ‘D’. Since these orders are disconnect orders and disconnect orders are excluded from this measure consistent with the SQM, BellSouth proposes to change the code to correct the problem. This proposed change was Item (10) on the Preliminary June Data Notification filed on April 1, 2004. (RQ5132)

Impact of Change: For January 2004 Regional data, 34 orders would be excluded from the volume of this measure. Excluding these records would have less than a .01% effect on this measure.

Special Access Measurements

(12) *Affected Measures:* SA-7 (Tennessee only)

Description of Change: Currently, the 12-Month SRS Report for Past Due Circuits, “% Cancellations After FOC Due Date” is not being produced in Tennessee. BellSouth proposes to produce this report. This proposed change was Item (11) on the Preliminary June Data Notification filed on April 1, 2004. (RQ5120)

Impact of Change: None.

PRELIMINARY JULY 2004 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the July 2004 data month. Results for the July 2004 data month will be posted as follows:

Preliminary results August 20, 2004
Final results August 31, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

- (1) *Affected Measures:* OSS-1, OSS-2, and all Pre-Ordering & Ordering Measures

Description of Change: In anticipation of Encore Release 16.0 and the associated modifications to the sequence of data fields from BellSouth's source systems (e.g., LEO, LESOG, etc.), BellSouth proposes changes to PMAP to ensure that data continues to be correctly captured and reported.

Impact of Change: None.

- (2) *Affected Measures:* O-8 & O-9

Description of Change: Currently, PMAP code is not excluding non-business hours from the FOC Timeliness and Reject Interval calculations for Local Interconnection Trunks as required by the SQM. BellSouth proposes to correct the code to exclude non-business hours consistent with the SQM. (RQ5160)

Impact of Change: For January 2004, in Tennessee, the result for FOC Timeliness would improve from 88.89% to 100% and Reject Interval would improve from 66.67% to 91.67% for Local Interconnection Trunks.

(3) *Affected Measures:* O-8, O-9 & O-11

Description of Change: Currently, PMAP is not capturing the appropriate FOC/Clarification response time for ELMS6 LNP LSRs. BellSouth proposes to correct this issue by obtaining the appropriate timestamp from another field in the LNP data feed. (RQ5188)

Impact of Change: For March 2004, for the Region, 83 of 3405 LNP records reported incorrect times for FOC Timeliness, 14 of 784 LNP records reported incorrect Clarification times and 97 of 4180 LNP records reported incorrect times for FOC and Reject Completeness.

(4) *Affected Measures:* O-7 & O-8

Description of Change: Currently, BellSouth is incorrectly reporting Partially Mechanized LSRs originated via ELMS6 as Fully Mechanized when the service representative works the LSR but does not identify it correctly. BellSouth proposes to change the PMAP code to correct this problem. (RQ5197)

Impact of Change: For February 2004, 91 Fully Mechanized LSRs for the region should have been reported as Partially Mechanized LSRs. Of these 91 LSRs, 6 were reported as misses for Fully Mechanized with no change to the total result.

(5) *Affected Measures:* O-3 & O-4

Description of Change: Currently, certain LEO LSRs originated via ELMS6 are being erroneously counted as “planned manual” fallout on the Flow-Through report because of a difference in the text of an audit message between TCIF9 and ELMS6. BellSouth proposes to correct the Flow-Through code to look for the new text. (RQ5198)

Impact of Change: For February 2004, 80 LSRs were incorrectly counted as “planned manual” fallout. For that period, aggregate and UNE Flow-Through would have improved by .01%.

Provisioning Measurements

(6) *Affected Measures:* P-1

Description of Change: Currently, Local Interconnection Trunk data is missing from the Held Order Interval Report. BellSouth proposes to include Local Interconnection Trunk data in this report as required by the SQM, to the extent such data exists. (RQ4816)

Impact of Change: BellSouth continues to investigate the impact of this proposed change and will quantify this impact as soon as possible.

- (7) *Affected Measures:* P-11 (Louisiana only)

Description of Change: Currently, the PMAP code is incorrectly populating CLEC volume in the interval distribution on the CLEC Specific MSA reports for LNP products. Instead of reflecting the total CLEC volume for the product as the denominator, the denominator for each interval distribution is the same as the numerator. BellSouth proposes to correct this problem. (RQ5032)

Impact of Change: None

- (8) *Affected Measures:* P-11

Description of Change: In anticipation of Encore Release 16.0 and the associated modifications to the sequence of data fields from BellSouth's source systems (e.g., LEO, LESOG, etc.), BellSouth proposes changes to PMAP to ensure that data continues to be correctly captured and reported. (RQ5210)

Impact of Change: None

- (9) *Affected Measures:* P-1, P-2A, P-2B, P-3, P-4A, P-4B, P-5, P-6 & P-9

Description of Change: Currently, BellSouth is not capturing all retail ADSL classes of service for these measurements. BellSouth proposes adding additional information to the product classification rules to identify and report all orders with retail ADSL activity. (RQ5216)

Impact of Change: For February 2004, in Florida, the Held Order Interval volume for ADSL, Dispatched, <10 Circuits, and Held for Facilities, would have increased by 15, or 5.8%. For Business, the Held Order Interval volume within the same categories would have decreased by 15, or 7.7%.

Billing Measurements

- (10) *Affected Measures:* B-10 (Florida, Georgia, North Carolina, and Tennessee)

Description of Change: Currently, invalid records, such as duplicate entries in the Billing Dispute Activity Tracking System (BDATS) dispute file, are being counted in the results. BellSouth proposes to correct this error. (RQ5184)

Impact of Change: For March 2004, in Florida, 0.4% of the total records reported were invalid.

Database Measurements

(11) *Affected Measures:* D-2

Description of Change: Currently, BellSouth is providing a regional report for this measure even though it is not required. BellSouth proposes discontinuing the production of a regional report for this measure consistent with the SQM. (RQ5068)

Impact of Change: The report will no longer be produced.

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STATE OF SOUTH CAROLINA)
)
COUNTY OF RICHLAND) **CERTIFICATE OF SERVICE**

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Proposed June 2004 Data Notification Report and Preliminary July 2004 Data Notification Report in Docket No. 2001-209-C to be served upon the following this May 17, 2004:

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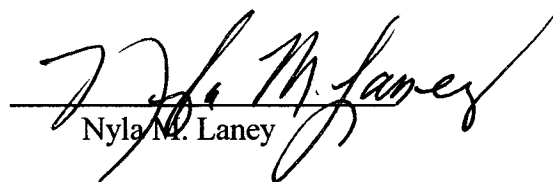
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